

STATE BOARD OF HEALTH
INDIANAPOLIS

OFFICE MEMORANDUM

TO: Earl A. Bohner, Director
Division of Water Pollution Control

FROM: David D. Lamm, Director *DDL 6/13*
Division of Land Pollution Control

DATE: June 13, 1985

THRU: Richard A. Strong *RAS*
Guinn Doyle *GD*
Ralph C. Pickard *6/14/85*

SUBJECT: Information Inspection and File Review
Complaint About Soils Removal
Bendix Corporation
980 Hurricane Street
Franklin, Indiana
IND 044587848



On May 23, 1985, Mr. Mike Sickels received a complaint from a former Bendix employee that contaminated soils were being removed and replaced with "good" soil.

Upon review of the files (see attached file audit checklist), it was determined that the facility has been mothballed but not closed. Mr. Bob Carter was notified by Bendix in late 1984 that shallow groundwater and soils had been contaminated on-site with cyanide and volatile organic compounds. Cyanide was also detected in city wells (100 feet deep wells) ranging from 105 to 473 ppb (see Bob Carter's memo dated February 21, 1985).

Mr. Carter initially contacted Ms. Karyl Schmidt of our Division for comment concerning site cleanup, but no cleanup plan was ever submitted to this office for approval or review by the Technical Support Branch. Later in April of 1985, Mr. Carter contacted Ms. Jacqueline Strecker concerning a meeting with the industry and county health department representatives. Ms. Strecker had the impression it was a closed facility, not a RCRA facility, and had no available personnel to attend the meeting.

The facility is a G/TSD with underground storage and drum storage listed on their Part A permit application. In a phone conversation with Mr. Burt Fleischer, this was confirmed. Mr. Fleischer stated that the ongoing activity is a "cleanup," not a closure of the facility. This facility, per Mr. Fleischer, will be put up for sale as a TSDF after the site cleanup.

This cleanup activity has focused on the floor and subsoils under the plating room inside the plant, but does not deal with contamination along the old sewer line. A new sewer (8-inch) was installed, offset 35 feet from the old line to avoid excavation of any

possibly contaminated subsoils (see Mr. Wayne Barto's letter and map dated May 29, 1985). Contamination along the plant sewer line ranged from 1,000 to 77,480 ppb of volatile organic compounds (listed wastes). This indicated further work is needed, but has not been addressed thus far.

The Plan Review and Permit Section is requesting the U.S. EPA, Region V, to call in their Part B permit. They will then put them on the list for a Facility Management Plan and begin a Corrective Action Response review for any and all releases.

This facility also appears to meet the criteria for inclusion on the National Priorities List should it be improperly closed or abandoned. The requirements for site investigation and cleanup plan approval under CERCLA have not been addressed adequately. The Company needs to be aware that the cleanup approval granted by the Groundwater Section of the Division of Water Pollution Control will not preclude future requirements under CERCLA should corrective actions under RCRA prove unsatisfactory.

It should also be noted that all contaminated soil, including exhaust vent ducts and concrete, an estimated total of 387 cubic yards, have been disposed of at Adams Center Landfill under a category approval F008. The facility has identified F005, F006, F007, and also F009 waste streams in their Part A.

Mr. Fleischer of Allied Amphenol Products, the parent company of Bendix, sent in a copy of the cleanup plan (for inside the plant). This will be forwarded to the Technical Support Branch for review.

From review of the information available and a site visit on May 23, 1985, the current cleanup plan appears to be inadequate to address the U.S. EPA standards and procedures for remedial action or closure. I would suggest that your letter indicate that your approval does not obviate Bendix-Allied's responsibility under State and Federal hazardous waste statutes and regulations.

REH/tr

cc: Bendix Corporation RCRA File
Mr. Thomas Russell
Ms. Jacqueline Strecker